

**BARRACK, RODOS & BACINE**

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Teamsters Local 282 Benefit Trust Funds*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS LOCAL  
282 BENEFIT TRUST FUNDS TO  
SECURITIES LEAD PLAINTIFF'S  
OBJECTION TO REORGANIZED  
DEBTORS' MOTION TO APPROVE  
SECURITIES ADR AND RELATED  
PROCEDURES FOR RESOLVING  
SUBORDINATED SECURITIES CLAIMS  
[D.I. 9189]**

1 International Brotherhood of Teamsters Local 282 Benefit Trust Funds (“Local 282 Trust  
2 Funds”), the holder of a Securities Claim<sup>1</sup> and a creditor in the chapter 11 bankruptcy cases (the  
3 “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as  
4 reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through its undersigned  
5 counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff’s Objection to Reorganized*  
6 *Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated*  
7 *Securities Claims* [Docket No. 9189] (the “**Securities ADR Objection**”), in opposition to  
8 *Reorganized Debtors’ Motion to Approve Securities ADR and Related Procedures for Resolving*  
9 *Subordinated Securities Claims* [Docket No. 8964] (the “**Securities ADR Motion**”). In support  
10 of this Joinder, Local 282 Trust Funds, respectfully state as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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- 13 1. Local 282 Trust Funds is a Securities Claimant and timely filed proofs of claim  
14 against the Debtors by the Extended Bar Date (Claim Nos. C#URA27423 and WIMQZ27423).
- 15 2. Local 282 Trust Funds incorporate by reference and hereby joins in all arguments set  
16 forth in the Securities ADR Objection.
- 17 3. Local 282 Trust Funds reserve its right to supplement this Joinder and further  
18 reserve its rights to participate in any hearing to consider the Securities ADR Motion, including  
19 its rights to make any arguments and to examine witnesses.
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26 <sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities  
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as  
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, Local 282 Trust Funds respectfully request that this  
3 Court enter an Order denying the Securities ADR Motion and granting such other and further  
4 relief as may be just and proper.  
5

6 Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

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